



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029**

August, 28, 2006

Allegheny National Forest
Attn: Forest Plan Revision Comments
PO Box 36
Warren, PA 16365

Re: Draft Environmental Impact Statement to Accompany the Proposed Land and Resource Management Plan, Allegheny National Forest, Elk, Forest, McKean, and Warren Counties, PA May 2006 CEQ #20060205

Dear Sir:

In accordance with the National Environmental Policy Act (NEPA), and Section 309 of the Clean Air Act the United States Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) for the above referenced project. Based on our review of the DEIS, EPA has rated the environmental impacts of the preferred alternative as "EC" (Environmental Concerns) and the adequacy of the impact statement as "2" (Insufficient Information). A copy of EPA's ranking system is enclosed for your reference. The basis for this rating is contained in the remainder of this letter and in the attached detailed comments.

Project Description:

The Allegheny National Forest was established in 1923 and is approximately 513, 325 acres. There are 201 miles of hiking trails, 53 miles of cross country skiing trails, 106 miles of AT V trails, 366 miles of snow mobile loop. In addition there are 1, 270 miles of Forest Service roads, 281 miles of state or township roads, and 1,236 miles of oil, gas, and mineral roads (not managed by FS). Ninety-three percent of the mineral rights are owned by non-federal entities. There are about 7,000 oil and gas wells, which use approximately 50,000 acres of the ANF.

The Allegheny National Forest (ANF) proposes to revise its Land and Resource Management Plan as required by the National Forest Management Act (NFMA) of 1976. The current Land and Resource Management Plan (1986 Forest Plan) was approved in 1986 and has been amended 14 times to incorporate new information and to address changed conditions. This DEIS describes four alternatives for revising the 1986 Forest plan. The year 2020 is referred to as the end of this planning period.

An interdisciplinary team identified three major areas of the 1986 Forest Plan that needed change to address preliminary issues: Vegetative management need for change, habitat diversity need for change, recreation and special area designation need for change. Vegetative

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Management involves maintaining healthy forest conditions capable of providing sustainable levels of forest products. It includes maintaining a diversity of tree species and age classes, addressing forest health, reforestation techniques, and the silvicultural system used. Habitat diversity is primarily concerned with maintaining viability of native and desired species, ecosystem and species diversity, and habitat connectivity. Recreation involves provision of an appropriate array of recreational opportunities for the public.

The team also identified a need to clarify and strengthen guidance in the Forest Plan for seven other resource areas, in order to bring the new Forest Plan into alignment with the 2004-2008 Forest Service Strategic Plan. These include: soil and water quality, heritage resources, scenery, transportation systems, monitoring, management areas, reorganization of Forest Plan Format.

Alternatives:

Four alternatives are analyzed in detail in the DEIS. The following elements are common to all alternatives: white-tailed deer are managed to densities that range between 10 and 20 deer per square mile, trail management for all uses except ATV/OHM and equestrian use, forest health treatments for insects and disease, management of oil and gas development, all areas with special designation under the 1986 Forest Plan continues to be protected.

Alternative A (“No Action”) includes: Five intensive use areas (IUAs) for ATV/OHM use on designated trails, open riding across the Forest for equestrians, few areas for semi-primitive, non-motorized recreation, current direction for protection of riparian areas and threatened, endangered, and sensitive species.

Alternatives B, C, and D have the following features in common: updated standards and guidelines for herbicide application, updated standards and guidelines for habitat protection of threatened and endangered species, and species with viability concerns, objectives, standards, and guidelines for greater protection of riparian corridors, adjustment to MA 7.1 to provide developed recreation with considerable facilities, provisions of MA 8.11 for management of recreation and scenic river segments of Wild and Scenic Rivers, recommendation for expansion of Kane experimental Forest, recommendation of Buckaloons as a designated historic area, all previously identified RARE II areas do not allow scheduled timber production and new Forest Service road construction.

Alternative B includes: greatest level of early structural habitat conditions, Clarion River area managed for remote recreation, Minister Valley area managed for interpretive recreation, no recommendations for additional wilderness study areas, five IUAs for ATV/OHM use on designated trails, four EUAs where equestrian use is limited to designated trails, but open riding is permitted on most of the rest of the forest.

Alternative C (preferred alternative) includes: recommendation for two wilderness study areas (Tracy Ridge and Chestnut Ridge) totaling more than 14, 000 acres, Four remote recreation areas (Clarion River, Minister Valley, Morrison, and Hearts Content) totaling approximately 4, 670 acres, five IUAs for ATV/OHM use on designated trails (less acreage than Alternative B), Four EUAs where equestrian use is limited to designated trails, but open riding is permitted on most of the rest of the forest. Also emphasizes a balanced mix of forest age classes and habitat



diversity.

Alternative D emphasizes restoration of older forest conditions in upland and northern hardwood forest types. It also includes: recommendation for four wilderness study areas (Tracy Ridge, Chestnut Ridge, Minister Valley, and Allegheny Front) totaling 30,000 acres, six remote recreation areas (Clarion River, Lamentation Run, Hearts Content, Morrisison, Longhouse, and South Cornplanter) totaling 30,944 acres, three IAUs for ATV/OHM use on designated trails, three EUAs where equestrian use is limited to designated trails.

General Comments:

It appears that the preferred alternative balances many of the issues associated with the ANF, however, based on our review; we have serious concerns regarding impacts to the Forest resulting from numerous activities, especially potential oil, gas, and mineral activities. Based on the information provided, there is an anticipated range of 3,375 to 12, 000 new wells and 850 to 3,000 miles of additional oil and gas roads on the ANF, and by the year 2020 some mineral development. This oil and gas development could result in 6,000 to 20,000 impacted acres from the present through 2025. The DEIS documents direct, indirect and cumulative impacts associated with these activities which include habitat loss, fragmentation, and sedimentation. We strongly encourage the Forest Service to work with the PADEP and the OGM developers to further avoid and minimize impacts associated with these projects. The FEIS should include details as to the minimization efforts that will be implemented.

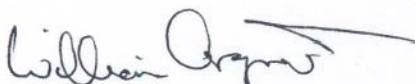
The DEIS should also discuss mitigation and minimization of all impacts associated with activities that occur in the ANF. Sensitive areas should be avoided, and areas of disturbance should be stabilized and restored as soon as possible. The use of herbicides and other chemicals should be minimized to the fullest extent possible.

The FS should work closely with the appropriate state and federal agencies regarding threatened and endangered species and their habitats, and the control of invasive species.

While the DEIS provides a lot of information, it is difficult to navigate the various chapters. A more detailed table of contents and numbered sections within the chapters would be helpful.

Thank you for the opportunity to offer these comments. If you have any questions, please contact Barbara Okorn at (215)814-3330.

Sincerely,



William Arguto,
NEPA Team Leader

